

EXHIBIT 33

1 X06-UWY-CV18-6046436-S : SUPERIOR COURT

2 ERICA LAFFERTY : COMPLEX LITIGATION DOCKET

3 v : AT WATERBURY, CONNECTICUT

4 ALEX EMERIC JONES : SEPTEMBER 21, 2022

5
X06-UWY-CV18-6046437-S : SUPERIOR COURT

6 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET

7 v : AT WATERBURY, CONNECTICUT

8 ALEX EMERIC JONES : SEPTEMBER 21, 2022

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11 v : AT WATERBURY, CONNECTICUT

12 ALEX EMERIC JONES : SEPTEMBER 21, 2022

13 BEFORE THE HONORABLE BARBARA BELLIS, JUDGE AND JURY

14 **VOLUME III OF IV**

15 **WITNESS: CONTINUED EXAMINATION OF ERICA LAFFERTY 2:00 UNTIL
P.M RECESS**

16 A P P E A R A N C E S:

17 Representing the Plaintiffs:

18 ATTORNEY CHRISTOPHER MATTEI

19 ATTORNEY ALINOR STERLING

20 ATTORNEY JOSHUA KOSKOFF

21 ATTORNEY MATTHEW BLUMENTHAL

22 Representing the Defendant:

23 ATTORNEY NORMAN PATTIS

24 RECORDED BY:

25 KENDYL HENAGHAN

26 TRANSCRIBED BY:

27 LINDA COON, RPR

Court Monitor/Court Reporter

400 Grand Street

Waterbury, CT 06702

1 (IN SESSION)

2 THE COURT: Good afternoon, marshal, good
3 afternoon, everyone.

4 Are we ready for the jury?

5 ATTY. MATTEI: Yes, Your Honor.

6 Would you like Miss Lafferty to take the stand
7 now, Judge?

8 THE COURT: Either way. It doesn't matter.

9 ATTY. PATTIS: While the jury is coming down,
10 can we do a sidebar?

11 THE COURT: They are almost here.

12 ATTY. PATTIS: Okay.

13 (JURY PANEL ENTER).

14 THE COURT: Good afternoon, everyone. Welcome
15 back.

16 I hope some of you got to enjoy the nice
17 weather.

18 Counsel stipulate that our entire panel has
19 returned?

20 ATTY. MATTEI: Yes, Your Honor.

21 ATTY. PATTIS: Yes.

22 THE COURT: All right. Please be seated.

23 ATTY. MATTEI: Okay. Miss Lafferty, can you
24 take the stand here?

25 THE COURT: Absolutely. Just watch your step.
26 Whenever you are ready, Attorney Mattei.

27 ATTY. MATTEI: Thank you, Your Honor.

1 ERICA LAFFERTY,

2 CONTINUED DIRECT EXAMINATION BY ATTY. MATTEI:

3 Q Welcome back, Erica.

4 So, when we left, I think we had gotten to
5 around 2010 when you were talking about how your mom had
6 been hired as the new principal at Sandy Hook Elementary
7 School?

8 A Yes.

9 Q And could you give the jury a sense of what was
10 happening in your life at the time? I think you would have
11 been around 25 around that time?

12 A Yeah. I was 25. I spent the majority of my life in
13 sales of some capacity. I did a lot with cell phones.

14 My sister, at that time, had three kids who
15 took up a large majority of my life. I think more for my
16 purposes than theirs. But, yeah, she had the three kids,
17 and I spent a ton of time with them. My mom, you know, was
18 in the process of building her dream house in the
19 Aderondacks so I spent a lot of time up there.

20 Q What about your grandma. I think you mentioned
21 before, like, your grandparents had been involved when you
22 were -- when you were really young, you lived with them.
23 What was your relationship with them, like, around this
24 time?

25 A So, my grandparents got divorced, I think I was about
26 ten, and my grandfather died in 2003. My grandmother was
27 living in Waterbury in 2011, she retired and moved up to

1 family property in the Aderondacks. So, my mom was also
2 helping to, like, kind of rehab her house, my grandma's
3 house, build her own house. So, we were up there a ton.

4 Q Was the idea that your grandma was going to retire up
5 there and your mom would have a place right near her?

6 A Literally, right next door. Yeah. My grandmother
7 broke off a piece of her land and gave it to my mom to build
8 a house big enough to house our large family.

9 Q And you went to -- did you say you went to high
10 school in Woodbury?

11 A Yes. I transferred from Naugatuck High School to
12 Nonnewaug.

13 Q To where?

14 A Nonnewaug, in Woodbury.

15 Q Nonnewaug.

16 Okay. And, then, after Nonnewaug, did you
17 pursue any postsecondary education?

18 A I went to Naugatuck Valley, graduated with an
19 associates in legal studies, but my primary focus was always
20 work.

21 Q And in 2010, now, this is when your mom took the job
22 at Sandy Hook, were you and she living together?

23 A She called me her basement dweller because I was 27
24 and still kind of in and out. Like, oh, I'm going to go
25 live with a friend, but I missed my mommy and I want to come
26 back home. So, I had a bedroom in her house from birth to
27 the time I was 27.

1 Q Okay. 27. This is now moving --

2 A 2012. Yeah. Yeah. I officially told her, okay, you
3 can eliminate my bedroom in the end of July right before the
4 shooting.

5 Q Okay. So, July of 2012, you finally move out?

6 A At 27. Yes, I'm going to own that.

7 Q I take it, though, that even though you moved out, I
8 mean, you can't fully -- I guess, my wife would say, cut
9 those apron strings?

10 A Yeah.

11 Q So, did you continue to kind of see your mom a lot?

12 A I was up -- I mean, at that point she was spending at
13 least every Saturday, Sunday. Sometimes she would go up on
14 Friday after work, take a Friday off --

15 Q I see?

16 A -- take a long weekend because the house was --
17 her house was, you know, in the final stages of being built.
18 So, I was with her every single weekend. Usually saw her at
19 my sister's house at least once a week, or I would be
20 driving to her house, like, hey, can you feed me, I can't
21 cook.

22 Q Did she like that? She didn't like that? She would
23 pretend --

24 A I mean, I think she had a love/hate relationship with
25 it. But, yeah, sometimes she would kick me out and send me
26 to my sisters, like, let her feed you, she's doing the
27 things any way.

1 Q Okay. And, so, coming up on the 2012 school year,
2 were you and your mom discussing what she was hoping for out
3 of that 2012 school year at Sandy Hook?

4 A Back to school was her favorite time of year. She
5 was always excited to meet the kindergarten class. She was
6 excited to watch teachers set up their classrooms, she was
7 excited to reorganize her office even though she never
8 really never made any major changes but, like, new pens
9 excited her because that's just the kind of person that she
10 was. But in the 2012 to 13 school year, she was actually
11 planning a trip to China. My understanding is it was some
12 kind of, like, teaching exchange situation that some of the
13 teachers in Newtown were going to participate in, and as
14 soon as she heard about it, she was like, yes, I am so in
15 for this trip to China.

16 Q And did you become aware that at the beginning of
17 that school year, your mom decided to start a Twitter
18 account related to Sandy Hook Elementary School?

19 A She did. She did. She was very active on Twitter.

20 Q Okay.

21 A For sure.

22 Q And, we have --

23 By the way, is that Twitter account still
24 public and available?

25 A It is. Yes.

26 ATTY. MATTEI: Why don't we -- why don't we pull
27 some of that up? Let's start with Exhibit --

1 I think these are in. Correct me if I'm wrong,
2 Attorney Ferraro, 440 through 445?

3 ATTY. PATTIS: They are in.

4 THE CLERK: Yes. They are full exhibits.

5 ATTY. MATTEI: Okay. And I also have 447
6 through 450?

7 THE CLERK: Yes. Full exhibits.

8 ATTY. PATTIS: Agreed.

9 ATTY. MATTEI: Great.

10 Why don't we start just at 440 if we have it?

11 And we can blow it up and see if everybody can
12 see here.

13 Q Okay. So, Erica, this looks like a Twitter post,
14 TWEET, I guess, from your mom's account on September 24,
15 2012?

16 A Yup. It does.

17 Q What are we seeing here?

18 A That's, like, th, courtyard at the Sandy Hook School.
19 It looks like parents. Is that parents?

20 Q Parents Insuring Another Great Learning --

21 A Yeah.

22 Q You might have it right in front of you if it's
23 easier, so you don't have to --

24 A Yeah.

25 Q Parents Insuring Another Great Learning Space At
26 Sandy Hook?

27 A Did they have the parents coming to the -- I don't

1 know. That's kind of cool.

2 Yeah. That's the courtyard.

3 Q Is this the kind of thing that your mom would TWEET
4 out to kind of let the community know what was happening?

5 A Absolutely. Yeah.

6 ATTY. MATTEI: Let's go to 441.

7 Q And I take it that you had spent a fair amount of
8 time at the school itself visiting your mom; right?

9 A All of her schools. Always. Yes.

10 Q Okay. So, let's pull this one up. Okay. So, the
11 date on this one, Erica, is October 17, 2012. So, maybe
12 three weeks later?

13 A Yes.

14 Q And Safety First At Sandy Hook. It's A Beautiful Day
15 For Our Annual Evacuation Drill. Do you see that?

16 A Yup. I'm like reading it and her, like little
17 singsong voice.

18 Q In your mom's voice as if she was saying it?

19 So, this is just a fire drill; right?

20 A Yup.

21 ATTY. MATTEI: Let's go to the next one. Let's
22 go to, I guess, 442.

23 Q Okay. October 18th, next day, Sandy Hook and
24 Education Connection Celebrate Fall. Do you know what this
25 is about?

26 A I don't.

27 Q Okay. Also at the cafeteria, maybe, kids getting

1 together in the cafeteria?

2 A It does, yeah. I recognize some of the teachers..

3 ATTY. MATTEI: Okay. Let's go to the next one.

4 Q November 12, 2012. Sandy Hook Says Thank You At Our
5 Annual Veteran's Day Breakfast.

6 Do you remember talking to your mom about this?

7 A I remember that morning she was not happy that she
8 had to eat two breakfasts because her husband always wanted
9 to have breakfast with her and she was like, no, I have one
10 at school, so it was like a big thing.

11 Q Okay.

12 A So, she had to, like, pretend to eat a little bit at
13 home so that she can have the good stuff.

14 Q At the Veteran's Day Breakfast?

15 A At the Veteran's Day Breakfast.

16 Q Okay.

17 THE COURT: And just for the record, that's
18 Exhibit 444?

19 ATTY. MATTEI: Yes, Your Honor. Thank you.

20 And let's advance to 445, please.

21 Q I want to show you this one.

22 November 14th, Sandy Hook Staff Raises Money
23 For Adopt-a-Family. Do you remember this?

24 A Yes.

25 Q I want to direct your attention. The young woman in
26 the center here, do you recognize who that is?

27 A I do. That's Victoria Soto.

1 Q In the brown sweater there?

2 A Yes.

3 Q And Miss Soto's family are among the family's that
4 have brought this case as well; right?

5 A Correct.

6 Q And Miss Soto was murdered at Sandy Hook School?

7 A She was.

8 ATTY. MATTEI: Why don't we go to 447.

9 Q Okay. This is November 16th, the Sandy Hook Book
10 Fair. Read With First Graders. Keeping Books In Our Hearts
11 And In Our Minds.

12 This is first graders learning to read with a
13 fairy princess sign?

14 A It is the book fairy.

15 Q Book fairy. Thank you.

16 It's also in the courtyard that we saw earlier?

17 A It is.

18 ATTY. MATTEI: Go to 448.

19 Q More first graders.

20 Sandy Hook First Graders Learn About the Three A's Of
21 Concert Behavior: Attention, Appreciation, and Applause.
22 Is that right?

23 A Yes.

24 Q The kids were getting ready for the holiday concert?

25 A Yes.

26 ATTY. MATTEI: Let's go to the next one, 449.

27 And here we are at the concert.

1 Sandy Hook students Enjoy the Rehearsal of Our
2 Fourth Grade Winter Concert. Talented Group Led By
3 Maryrose Kristopik, yeah?

4 A Yes.

5 Q Do you remember this concert, your mom talking about
6 it, or did you go?

7 A I remember that she borrowed a red scarf from the
8 librarian to wear with a gold sweater dress that she lost
9 the belt for, and she wanted something to accent her sweater
10 dress, so she borrowed a red scarf from the librarian which
11 she then returned the morning of December 14th.

12 Q And this is just -- this is two days before?

13 A Yes.

14 ATTY. MATTEI: Let's go to the next photo. This
15 will be 450.

16 Q This is December 13, 2012. Setting up for the Sandy
17 Hook Nonfiction Book Preview For Staff. Common Core, Here
18 We Come.

19 I see you smiling there. Is that because your mom
20 was talking about common core?

21 A A lot. Yeah. She had a love/hate relationship with
22 changing math.

23 Q There was some curriculum changes that were kind of
24 happening around this time; right?

25 A Yes. Yes. And she was trying to be excited about it
26 for her staff, but was having some personal struggles with
27 the concept of it. And she had a kid who was horrible with

1 math, so that could be.

2 Q And your mom's Twitter account, which is Dawn
3 Hocksprung, that's just her name; right?

4 A Part of it.

5 Q And that was -- oh, because you would refer to her as
6 Dawn Lafferty-Hocksprung; right?

7 A I believe the only one, Dawn Lafferty-Hocksprung.

8 Q Okay. These pictures were all for everybody to see,
9 all following right up until the day of the shooting; right?

10 A They are still available.

11 Q They are still there?

12 A Correct.

13 Q Everyday?

14 A Yes.

15 Q This was just a regular school; right?

16 A Yes.

17 Q Kids come there everyday?

18 A Yes.

19 Q It was open?

20 ATTY. PATTIS: Objection. Leading, Judge.

21 Q Was it open?

22 A It was absolutely open. I was there and helped
23 decorate.

24 Q Was it a toxic waste dump?

25 A Not by any means.

26 Q In fact, did you know who the school custodian was?

27 A Both of them. Yes.

1 Q What were their names?

2 A Kevin Androloti(phonetic) was the lead custodian, and
3 then Rick, whose last name I can't recall. But they took
4 great pride in the school, and were there in minutes --
5 within, absolute minutes, with any requests that my mom had
6 or probably any teacher.

7 Q Did your mom love those guys?

8 A More than anything.

9 Q The jury has heard a video of Alex Jones calling this
10 school a cutout, stage. Was it a stage?

11 A No. It was an elementary school.

12 Q Erica, I'm not going to ask you -- I'm not going to
13 ask you to go into the morning of December 14, 2012, or even
14 that day.

15 A Okay.

16 Q You were here for Bill Aldenberg's testimony; yes?

17 A Yes.

18 Q Carlee Soto's testimony?

19 A Yes.

20 Q It was the worst day of your life; wasn't it?

21 A Without a doubt.

22 Q Okay. At some point, did you learn about your mom's
23 last moments?

24 A I did. She was shot and killed confronting the
25 gunman.

26 Q You learned that from investigators?

27 A Yes.

1 Q Did you learn anything about before that terrible
2 moment whether your mom had interacted with Vicki Soto
3 earlier that morning?

4 ATTY. PATTIS: It's going to be hearsay, Judge.

5 ATTY. MATTEI: I'm offering it to show the
6 impact on Miss Lafferty, and the impact of Mr. Jones'
7 subsequent denials of her mother's existence.

8 ATTY. PATTIS: Compound.

9 THE COURT: Overruled.

10 A That morning, I was told by some of the faculty
11 members that Vicki had come into the office later than
12 usual, but by any normal standards, on-time, but just not
13 on-time for who Vicki and Dawn were, and she had spilled
14 coffee on her sweater. And my mom was, of course, laughing
15 at her because that's what Dawn did, and helped her to, you
16 know, clean the coffee off of her sweater because I think
17 there were parents that were supposed to be going into
18 Vicki's classroom that day and she was, you know, obviously
19 embarrassed that she had spilled coffee on herself, so my
20 mom was helping to remedy that situation.

21 Q The fact that your mom was killed confronting a
22 gunman as he entered the school, has it become important to
23 you in your memory and your understanding of who your mother
24 was?

25 A It's probably one of the most important things I know
26 about her.

27 Q Has that been a source of pride for you even as you

1 grieve the loss of your mother?

2 A Absolutely. I was very angry for a while because I
3 was told that she had identified noises that she heard to be
4 gunshots and decided to go out into the hallway any way.
5 But I can feel nothing but pride about that now because it's
6 just who she was. She would have done anything -- did do
7 everything in her power to protect her staff and most
8 importantly, her students. She acted no differently as she
9 would, if it was my sister and I in that school.

10 Q Erica, I want you to -- in the days and weeks after
11 the shooting, I want to focus you now on why we are here.
12 Did there come a point where you started to realize that
13 something was happening, that is, that there were people who
14 were claiming that the shooting hadn't happened, that it was
15 fake?

16 A Um, yes. I don't recall specifically when, but
17 within weeks, I know that I was being tagged on Facebook and
18 Twitter. I was getting direct messages on Facebook and
19 Twitter. Sometimes it was my friends, like, saying, you
20 know, here is this article that's saying that Sandy Hook is
21 fake, and they were, like, no, this is her daughter. And
22 they would tag me in it, or it would be a message on Twitter
23 just telling me that I'm part of a conspiracy, and it was
24 very frequent and very very early on.

25 Q Let me ask you -- because I -- when you said that you
26 would -- somebody would tag you. And I think Carlee may
27 have talked about this a little bit, but what does that --

1 how would you know that somebody had tagged you? How does
2 that work?

3 A I think, now, you just type the person's name and it
4 gives you an option of, like, your friends, that you can
5 select, and the majority of the time it was on, like, a news
6 article.

7 Q So back up a second.

8 So, how do you find out that somebody has
9 tagged you? Do you get, like, an alert?

10 A It gives, like, a notification on my phone.

11 Q So, you had a Facebook account yourself?

12 A Correct.

13 Q And Facebook would alert you that somebody had tagged
14 you?

15 A Correct.

16 Q Meaning that they had kind of put your name next to
17 another piece of content?

18 A Yes.

19 Q And then that when you were tagged in these things,
20 is when you were starting to see this stuff saying that
21 Sandy Hook was fake?

22 A Yeah. A hoax, conspiracy, actors.

23 Q And you said that your friends would -- what would
24 your friends be doing?

25 A I think they were trying to help by just saying,
26 like, this wasn't fake. Like, Erica Lafferty, this is her
27 daughter. And they would, basically, insert me into the

1 conversation or the comment section.

2 Q So, like, what's your reactions when you are seeing
3 this? I mean, had you ever heard of anything like this
4 before?

5 A Absolutely not.

6 Q So, when you are seeing this, you just lost your mom,
7 what's going through your head about how to deal with this?

8 A How to deal with it. I couldn't process the idea of
9 it in general so having to deal with it wasn't a thought.

10 I --

11 Q Explain to the jury the volume -- so you were on
12 Facebook and you were on Twitter?

13 A Yes.

14 Q Okay. Did you have an e-mail account as well?

15 A Yes.

16 Q So, just in that -- you said this started within an
17 amount of weeks?

18 A Correct.

19 Q Just explain to the jury, like, once this stuff
20 started, what -- how much was it? Like, what's the volume
21 we are talking about?

22 A Daily for sure. Multiple times daily, as time went
23 on. Over time, I wouldn't even know where to begin to
24 estimate a number.

25 Q You mentioned that at the outset it was stuff like,
26 this is fake, you are an actress, it's a hoax. Describe for
27 the jury, like, other types of -- when it first started, is

1 that the general type of stuff that you were getting?

2 A Yes. It was pretty generic at the beginning, and
3 then as time went on, it got more specific, and a lot more
4 scary. You know, things would be mailed to my house. There
5 were, you know, threats of rape and --

6 Q Wait. Wait, wait a second. You were receiving
7 threats from people saying they were going to rape you?

8 A Correct.

9 Q Is this online?

10 A Yes.

11 Q Was this kind of thing, like, frequent, that type of
12 graphic, violent stuff?

13 A Not as frequent as the hoax, and conspiracy, and
14 actress, situation, but the letters to my house, the random
15 death or rape threats would come in. I attempted to report
16 it to the police department in the town that I lived in, and
17 I was just told that it wasn't specific enough, or they
18 couldn't track it, or, you know, the post had been deleted,
19 or taken down, or the account was deleted, and there was
20 just no way possible to keep up or do anything.

21 Q So, just to orient the jury to the timeframe. Are we
22 talking about this is, like, within the first six months,
23 say, of 2013, that this is happening where it's going from
24 the hoax to the more violent stuff?

25 A It's in between 2013 to 2014.

26 Q Did there come a point with you learned of a
27 gentleman named Alex Jones?

1 A Yes. It was either the end of March or early April
2 of 2013.

3 Q Do you remember where you were when happened?

4 A Yes. I was at a restaurant with a colleague. I was
5 tagged on video on Facebook. I opened it. My phone, like,
6 automatically played the videos when I opened Facebook.
7 And, it -- I don't recall exactly what video it was, but it
8 was just, you know, just saying that Sandy Hook was fake.
9 And the most wild and aggressive voice was just booming out
10 of my phone, and I shut it down within seconds and was,
11 like, I can't. I just -- like, I'm with colleagues, I can't
12 do this right now.

13 Q Alex Jones' voice just started booming out of your
14 phone and you shut it down?

15 A I didn't know it to be Alex Jones at the time. I did
16 see infowars.com on the video. I then learned that it was
17 Alex Jones.

18 Q At that point, did you do anything?

19 ATTY. PATTIS: Which point is this? I'm sorry.

20 Q After you pulled this video up on your phone. You
21 said you didn't know who it was at the time; right? You
22 just knew -- it was Infowars --

23 A Correct, yeah. In the couple of seconds that I
24 watched the video, I did not know it to be Alex Jones at
25 that time.

26 Q You hadn't heard -- as far as you know, had you heard
27 his name before?

1 A Never, no.

2 Q And so -- but you did see the infowars.com thing
3 associated with the video?

4 A Yes. And I took a screenshot of that because I was,
5 like, I'll deal with it later.

6 Q And did you try to deal with it later?

7 A I went to infowars.com either later that night or the
8 following morning, and the first thing that I saw was
9 something about a Sandy Hook. I don't know if it was,
10 actors, or conspiracy, or hoax, or what the words were. I
11 was just like, I -- it was just too much. It was just too
12 much, and I -- I wasn't -- I wasn't in a place where I could
13 deal with that.

14 Q So, you just X'd out of it?

15 A Yeah.

16 Q Put it aside?

17 Q You talked about receiving letters at your home?

18 A Yes.

19 Q What were these letters about?

20 A Objection. Foundation, hearsay.

21 Q Did you read them?

22 A I don't recall the specifics but, yes, I did read
23 them. The only thing I remember --

24 ATTY. PATTIS: Foundation, hearsay. Best
25 evidence.

26 ATTY. MATTEI: Your Honor, these are being
27 offered -- Miss Lafferty reviewed them.

1 THE COURT: Sustained.

2 ATTY. MATTEI: Thank you.

3 THE COURT: I'm sorry, overruled.

4 ATTY. MATTEI: Thank you, Judge.

5 A The only specific thing that I remember was the
6 common theme of the return address that was NR fifteen and
7 fifteen was spelled incorrectly. And it was mailed from, I
8 don't know what town in California.

9 Q So, you were getting repeatedly letters from this
10 supposed return address?

11 A I would assume that it was the same person based on
12 the fact that fifteen was consistently spelled incorrectly.

13 Q And were these letters more of the same, actress,
14 hoax, Sandy Hook didn't happen?

15 A Yes. That I should die, and then be buried next to
16 my fake, dead mother, however that's possible.

17 Q These letters actually said that?

18 A Yes. Fake, dead mother.

19 Q After -- well, during the 2013 timeframe, did your
20 sister, Tina, decide that she wanted to start a charity in
21 your mother's name?

22 A I think that it may have been earlier than that, but
23 it was very shortly after the shooting, she started the Dawn
24 Lafferty-Hocksprung Memorial Fund.

25 Q And what was her idea on that?

26 A A way to honor my mom. The premise of the foundation
27 is to -- we've raised -- we've done a ton of fundraisers and

1 raised money, and we give a scholarship away each year to a
2 Naugatuck High School student, because that's where my mom
3 went, who is looking to pursue a career in education --
4 someone who has Dawn-like qualities.

5 Q And are you guys still doing that, giving out
6 scholarships every year --

7 A Every year.

8 Q -- to a Naugatuck Senior?

9 A Every year.

10 Q And when Tina first started this, I take it there was
11 a Facebook page that people could go to to learn about
12 charity?

13 A Correct.

14 I started -- I don't remember how,
15 specifically, but I started a page on Facebook: The Dawn
16 Lafferty-Hocksprung Memorial Fund, and it gave a little
17 write-up of who my mom was, and why we were raising the
18 money, who the money would go to, and a little bit about the
19 Dawn-Like qualities of, you know, the students who would be
20 eligible to receive the scholarship award.

21 Q What happened to that Facebook page?

22 A It was up for a couple of months, because there were
23 an influx of comments on every post, and an influx of
24 messages that would come into it telling me that I'm lying,
25 I'm, you know, raising money off of a skit. Like, I'm
26 scamming people out of money, my mom never existed, Sandy
27 Hook never happened, and it was just too much for me to try

1 to deal with and I had to take that page down.

2 Q Did you ever try, Erica, to, you know, a lot of this
3 is happening online, did you ever try to engage with any of
4 these people who are coming after you?

5 A I did. Many times and --

6 Q Why?

7 A For 27 years of my life, that woman was my best
8 friend, and for people to tell me that she didn't exist, how
9 do you just let that happen? And I would engage with them,
10 I would send them pictures. And then the volume was just so
11 great, that I couldn't keep up with it, and it was just
12 swallowing me whole.

13 Q You would send them pictures of your mom to prove to
14 them she was real?

15 A Pictures when, you know, me and her when I was
16 little, or her holding one of my sister's kids when they
17 were born, or a picture of my mom and my sister at my
18 sister's wedding. I didn't get to have one of those.

19 Q You said at some point you just stopped trying?

20 A Yes. There was too many of them and only one of me.

21 Q These letters you got and the online threats you got,
22 what did that -- that caused you to fear for your own
23 safety? I mean, you were worried about how these people got
24 your address, and, like, what did you do about all that?

25 A I installed home security systems, I got more dogs.
26 I stopped really going out around town, I didn't really go
27 to grocery stores, I would have groceries delivered. Amazon

1 became my best friend so I didn't have to go to, like, a
2 Target or something.

3 Q Do you still live this way?

4 A Yes.

5 Q Have you been confronted in person by people who
6 claim that you are an actress and that your mother never
7 lived?

8 A Yes. Starting just a couple of weeks after the
9 shooting.

10 Q Here in Connecticut?

11 A Correct. In my hometown.

12 Q Woodbury?

13 A Yes.

14 Q Tell the jury about that?

15 A I was on my way to a birthday party. I think it was
16 early 2014. I was at a gas station --

17 Q So, this is a different one. Not right after, this
18 is a different one?

19 A Yeah. I'm sorry. Yeah, mm-hmm. I'm flustered.

20 This is just after the two-year anniversary, I was on
21 my way to a birthday party, and I was at a gas station and
22 somebody just walked out and pointed. And it was, like, you
23 are part of that Sandy Hook hoax or -- yeah, I think it was
24 that Sandy Hook hoax. There was -- yeah -- there was
25 another time in a grocery store where I walked by and
26 somebody would just, you know, kind of, like, say on the
27 side (INDISCERNIBLE) crisis actress. Like, how do you feel

1 comfortable going out in public when places that you know,
2 and trust, and have been going for years, you never know who
3 is going to say what. Like, how do you trust anything? How
4 do you trust your safety? How do you trust your security?
5 How do you know that this isn't one of the people who's
6 sending a threat to your house or a threat to my Twitter
7 account?

8 Q How many times have you moved since the shooting?

9 A I've lived in six different places, and it's been
10 five moves.

11 Q Why?

12 A Mostly, so that people don't know where I am.

13 Q In case they'll find you?

14 A Yes.

15 Q What other steps have you taken to protect your
16 identity?

17 A When I travel, primarily for work, I'll use an alias
18 if I have to order an Uber, or some sort of car service, use
19 a different name when I check into hotels.

20 Q You testified that one of the reasons, at least, for
21 a time you tried to engage these people, I'm paraphrasing,
22 but what I understood you to be saying was that you didn't
23 want this idea that your mother didn't exist to be
24 uncontested?

25 A Correct.

26 Q Did you have concerns about what your nephews and
27 niece might see as they grew older about their grandma?

1 A Very much. I think we can -- it's safe to say that
2 we are living in a world where information is widely
3 available on line. And my sister has four kids. Her
4 youngest was only six months old when my mom was killed.
5 There's going to come a time where Alison is going to want
6 to know about grandma outside of the stories we tell her. I
7 wanted to make sure I was, at least, taking steps to make
8 sure the first thing that came up when she Googled her
9 grandmother's name wasn't that she never existed, because
10 those kids deserve better than that.

11 Q Is this still happening to you?

12 A Yes.

13 Q Your mom was very real, wasn't she?

14 A Yes.

15 Q And you are very real?

16 A Yes.

17 ATTY. MATTEI: I have nothing further, Your
18 Honor.

19 THE COURT: Attorney Pattis?

20 ATTY. PATTIS: Thank you, Your Honor.

21 CROSS-EXAMINATION BY ATTY. PATTIS:

22 Q Do you need a moment, Miss Lafferty?

23 A I'm fine, thank you.

24 Q We've never met directly, have we?

25 A No.

26 Q I think I attended a deposition that somebody took of
27 you in this case; do you recall that?

1 A Yes.

2 Q That was Mr. Wolman?

3 A It was.

4 Q Do you need help with that?

5 A No. Long arms.

6 Q Where do you work?

7 A I work for Every Town For Gun Safety.

8 Q Every Town -- and that's out of New York?

9 A Yes.

10 Q And you have a grassroots organization as well?

11 A Correct.

12 Q And that grassroots organization was founded by a
13 woman named Shannon Watts?

14 A Correct.

15 Q And she's someone from Mom's Demand Action For Gun
16 Sense In America; correct?

17 A Correct.

18 Q You weren't working for that group before the death
19 of your mother?

20 A It didn't exist before the death of my mother.

21 Q Was it formed because of the Sandy Hook shootings?

22 A Every Town For Gun Safety or Mom's Demand Action?

23 Q First one. Let's do Every Town For Gun Safety.

24 A No. I wouldn't say that it was formed because of the
25 Sandy Hook shooting.

26 Q Do you know who funds it or funded it initially; is
27 that Michael Bloomberg?

1 A He's one of the funders, yes.

2 Q Former Mayor of New York?

3 A Correct.

4 Q And then Mom's For Gun Safety, who is that?

5 A Mom's Demand Action for Gun Safety in America.

6 Q Thank you.

7 Mom's Demand Action For Gun Safety in America;
8 was that founded in the wake of Sandy Hook?

9 A Yes, it was.

10 Q Did you have any interest in gun regulation prior to
11 the death of your mother, or gun control, gun safety?

12 A I didn't really have any views on firearms.

13 Q Did the death of your mother change those views?

14 A It formed views.

15 Q What views did it form?

16 A That there should be some sort of safety and security
17 measures in place further than what I understood them to be
18 at the time.

19 Q Do you -- do you have any idea -- withdrawn.

20 When did you first learn about Alex Jones?

21 A I believe it was the end of March, or early April,
22 2013.

23 Q So, shortly after your mother's death?

24 A Correct.

25 Q And I believe you said this is when you became aware,
26 because others had alerted you to what was going on?

27 A I was being tagged in posts about the hoax.

1 Q Okay. At any point since that point, the moment that
2 you first learned the name Alex Jones, have you come to
3 have -- understand that he has a viewpoint -- 0that he
4 articulates a viewpoint on guns?

5 A Not until I had sat in this courtroom last week.

6 Q So, is it your testimony, ma'am, that until you came
7 into this courtroom, you never -- you didn't know that Alex
8 Jones had a position on guns?

9 A I never watched his videos or --

10 Q You never watched any of them?

11 A -- or read anything that he wrote --

12 Q Okay. Did he ever --

13 A -- outside of a couple of seconds that I testified to
14 earlier.

15 Q Did he ever -- do you think he ever mentioned your
16 name, do you know?

17 A I wouldn't know. I never watched any of his videos.

18 Q I didn't ask you whether you watched his video, I'm
19 asking you, do you know, has he ever mentioned your name?

20 ATTY. MATTEI: Objection. Asked and answered.

21 A I wouldn't know.

22 ATTY. MATTEI: I think she said she wouldn't
23 know.

24 ATTY. PATTIS: No. She answered a different
25 question.

26 Q Has he ever mentioned your name?

27 A I wouldn't know.

1 Q Wouldn't you want to find out before you sued him?

2 ATTY. MATTEI: Objection, Your Honor.

3 THE COURT: Sustained.

4 Q Did you read the complaint that was filed in this
5 case before it was filed?

6 ATTY. MATTEI: Objection, Your Honor.

7 THE COURT: Sustained.

8 ATTY. MATTEI: Move to strike.

9 THE COURT: This is a hearing in damages.

10 ATTY. PATTIS: Understood.

11 Q And how many people sued Alex Jones would you to
12 know?

13 ATTY. MATTEI: Objection, Your Honor.

14 THE COURT: Sustained.

15 Q How many plaintiffs are in this case -- are there in
16 this case?

17 ATTY. MATTEI: Objection, Your Honor, relevance
18 to all of this.

19 THE COURT: I'll have a side bar.

20 ATTY. PATTIS: I'll withdraw it and move on,
21 Judge.

22 Q You didn't sue --

23 ATTY. MATTEI: Objection.

24 THE COURT: And I'll just mention --

25 Excuse me. I'll just mention to the jury that
26 we heard another political name a few minutes ago,
27 and I'll just remind you that this case is not about

1 politics. It's a hearing in damages.

2 Q What year did you sue Alex Jones in?

3 ATTY. MATTEI: Objection, Your Honor. None of
4 this is relevant.

5 THE COURT: I'll have to see counsel on the
6 sidebar.

7 (SIDEBAR).

8 THE COURT: This is a hearing in damages --

9 ATTY. PATTIS: Motive is never collateral.

10 THE COURT: The issue -- the only thing they are
11 considering here, is the extent of the damages.

12 ATTY. PATTIS: Motive is never collateral. An
13 interest in the outcome. She is working for a group
14 that is --

15 THE COURT: Well, then, inquire --

16 ATTY. PATTIS: I did.

17 THE COURT: -- about her gun positions. But
18 when liability is established --

19 ATTY. PATTIS: Motive is -- I mean, the record
20 is what it is. The law of the case is clear.

21 ATTY. MATTEI: All right. Are you done?

22 ATTY. PATTIS: I don't know.

23 ATTY. MATTEI: Oh I thought. Well, wait a
24 second, your Honor. Hold on.

25 Your Honor. Okay. She has now said several
26 times in response to questions, that she doesn't know
27 what Alex Jones what Alex Jones views on guns are.

1 That makes her views irrelevant to the question of
2 whether she's biased against Alex Jones. So, there
3 shouldn't be any further questions about this.

4 THE COURT: Now, I think we have a little bit of
5 a (INDISCERNIBLE) they can choose to leave it or not
6 leave it. Right?

7 ATTY. MATTEI: Oh, no. I don't think so, Your
8 Honor. They can't --

9 ATTY. PATTIS: I think -- I'm sorry, I cut you
10 off. I apologize.

11 ATTY. MATTEI: Your Honor, the question here is,
12 can a reasonable juror infer that she's exaggerating
13 her damages as a way to get back at Alex Jones about
14 his gun views. She's now said, she doesn't know
15 about this gun view are.

16 ATTY. PATTIS: No, that's not what --

17 THE COURT: And.

18 ATTY. PATTIS: That's not what she said.

19 ATTY. MATTEI: And there can be no reasonable
20 inference.

21 THE COURT: Attorney Pattis --

22 ATTY. PATTIS: That's not what she said. What
23 she said is, until she sat in this courtroom and saw
24 things. And she's testifying in this courtroom. I
25 think I get to go to show here 1E and ask her.

26 THE COURT: I think a (INDISCERNIBLE).

27 (END OF SIDEBAR).

1 ATTY. PATTIS: Trying to refer to 1E.

2 (EXHIBIT E).

3 PARALEGAL: He needs to have it up on the
4 screen.

5 THE COURT: What exhibit is this?

6 ATTY. PATTIS: 1E, Judge.

7 CONTINUED CROSS-EXAMINATION BY ATTY. PATTIS:

8 Q Ma'am, are you -- do you have a screen that -- I
9 don't know which one you are looking at. There is one next
10 to you, look at any one you like.

11 You've seen this video in this trial; correct?

12 A A portion of it, yes.

13 Q Have you ever seen anything -- have you ever seen it
14 before -- before this trial?

15 A No, I have not.

16 ATTY. PATTIS: Would you play it, John?

17 (VIDEO PLAYED)

18 Q Never heard anything about -- like that before until
19 you came into this trial; correct?

20 ATTY. MATTEI: Objection. Asked and answered.

21 THE COURT: You can answer it.

22 A That's correct.

23 Q And as you sit here today, you don't know what
24 Mr. Jones' positions are about guns; correct?

25 A I don't believe I said that. I don't believe I said
26 that.

27 Q Do you know now?

1 A Having watched this, it sounds like he thinks that
2 the man on that magazine was coming for his guns.

3 Q Who was the man on that magazines?

4 A President Obama.

5 THE COURT: And I'll just remind the jury,
6 again, that this case is not about Presidents,
7 Presidential Elections, politics. This is a hearing
8 in damages where you are tasked with determining the
9 amount of damages to be awarded.

10 Q And you've worked for Every Town For Gun Safety for
11 seven years now?

12 A It will be nine, next month.

13 Q And you never knew what Alex Jones' position is on
14 guns; correct?

15 A Correct.

16 Q Until this trial?

17 A That's correct.

18 THE COURT: Redirect?

19 ATTY. MATTEI: Yes.

20 REDIRECT EXAMINATION BY ATT. MATTEI:

21 ATTY. MATTEI: Let's play -- let's play clip
22 1C. Same video.

23 A Okay.

24 (VIDEO PLAYED)

25 ATTY. PATTIS: Well, this is scope, Judge. I
26 don't know that it matters.

27 ATTY. MATTEI: It's the same video, Judge.

1 (VIDEO PLAYED)

2 Q School Twitter photo of the kids lined up just a few
3 months ago; did you hear that?

4 A Yes.

5 Q Did we see that photo earlier?

6 ATTY. PATTIS: Scope, Judge.

7 ATTY. MATTEI: Same video, Your Honor.

8 THE COURT: Overruled.

9 A Yes, I believe it

10 ATTY. PATTIS: No, it's actually not.

11 ATTY. MATTEI: Excuse me. It is exactly --

12 THE COURT: I'll see counsel on the sidebar,
13 please?

14 (SIDEBAR).

15 ATTY. PATTIS: This is what I wanted --

16 THE COURT: It is the same video, but here is
17 what I'm going to tell you. I don't know how to say
18 no colloquy, no comments. I don't -- what else do I
19 need to say?

20 ATTY. PATTIS: If it's directed to me, I'm not
21 going to sit silently.

22 THE COURT: No, no. Well, you are commenting --

23 ATTY. PATTIS: He's looking at me and telling me
24 it's the same video. It's not.

25 THE COURT: You are commenting --

26 ATTY. PATTIS: I was showing 1E, he's showing
27 1C. It's a part I didn't show. It's beyond the

1 scope. And he's going to --

2 I'm not going to take an admonishment in the
3 presence of the jury from my adversary. I'm just not
4 going to take it.

5 ATTY. KOSKOFF: Excuse me. Sorry, Your Honor.
6 Everybody can hear Mr. Pattis.

7 Voice: (INDISCERNBBLE).

8 ATTY. PATTIS: We're ready.

9 THE COURT: No. Not yet.

10 I'll start with Attorney Mattei. What do I
11 need to do to stop your comments and the colloquy?
12 Just tell me what I need to do? Do I need to hold
13 you both in contempt?

14 ATTY. MATTEI: Your Honor --

15 THE COURT: Attorney Pattis? I'm not going to
16 have the comments anymore. I'm not going to have it.
17 I'm not going to have it.

18 ATTY. PATTIS: Do you expect me to lay silently
19 when they are directed at me inappropriately? Do you
20 expect me to rollover for my client? It's not going
21 to happen.

22 VOICE: Shhh (INDISCERNIBLE).

23 ATTY. PATTIS: Can I just say --

24 THE COURT: No.

25 (INDISCERNIBLE).

26 ATTY. PATTIS: Okay. Thank you, Judge.

27 ATTY. MATTEI: (INDISCERNIBLE) Attorney Pattis

1 (INDISCERNIBLE) padding objections and it's not of
2 Sandy Hook.

3 ATTY. PATTIS: It's not. He told the jury it
4 was and it's --

5 ATTY. MATTEI: That's just not --

6 ATTY. PATTIS: No. He. I objected scope. He
7 said it's the same video. That's improper. And I'm
8 not -- we showed 1E you are showing 1C. You are show
9 different --

10 ATTY. MATTEI: Same broadcast.

11 ATTY. PATTIS: No -- (INDISCERNIBLE).

12 THE COURT: (INDISCERNIBLE) it's not the same?

13 ATTY. PATTIS: No, it's not.

14 THE COURT: No?

15 ATTY. MATTEI: It's the same one.

16 ATTY. PATTIS: No. It's not the clip -- no.
17 It's not the clip that I showed. That's the point of
18 scope. And for him to turn out, I showed 1E, he
19 showing 1C. It's a different clip. It's beyond the
20 scope. And he's telling me -- he announcing to the
21 jury it is.

22 So, he runs this courtroom? He doesn't.

23 ATTY. MATTEI: (INDISCERNIBLE) I think that the
24 scope objection --

25 THE COURT: So, I'm going to overrule the
26 objection and I'm putting you both of you on notice
27 that I'm not going to have the comments anymore, the

1 colloquy. Whoever is the unlucky person that's the
2 next one to do it --

3 ATTY. PATTIS: Well, the next time it happens,
4 I'm going to ask to approach, then, and ask for an
5 admonishment of counsel --

6 THE COURT: No.

7 ATTY. PATTIS: -- because I'm not --

8 THE COURT: No. Attorney Pattis --

9 ATTY. PATTIS: -- going to take it.

10 THE COURT: You are not getting the last word in
11 here. So, I would suggest you stop. I will say
12 again, the next person who does it, will be on the
13 receiving end of a contempt, here. That's it.

14 ATTY. KOSKOFF: Excuse me, Your Honor. A
15 proposal, can we take our 15-minute recess after
16 this? We have a short day, and it would be a good
17 time to break. We just have one more witness
18 (INDISCERNIBLE).

19 THE COURT: After this?

20 ATTY. KOSKOFF: Yeah.

21 (END SIDEBAR).

22 ATTY. MATTEI: May I continue, Your Honor?

23 THE COURT: You may.

24 CONTINUED REDIRECT EXAMINATION BY ATTY. MATTEI:

25 ATTY. MATTEI: Let's play that clip again. It's
26 1C from the same broadcast.

27 ATTY. PATTIS: Scope, Judge. We played 1E.

1 THE COURT: I believe, Attorney Pattis, that you
2 made your objection. I overruled your objection.
3 The record is clear. And we don't have to keep
4 restating the objection. Thank you.

5 (VIDEO PLAYED)

6 Q So, we saw a school Twitter photo of the kids lined
7 up just a few months a go; right?

8 A Correct. From my mom's Twitter account.

9 Q That school was opened; right?

10 A Absolutely.

11 Q Mr. Jones is referring to that photo, isn't he?

12 A I believe so.

13 Q Mr. Pattis asked you about your work at Every Town?

14 A Correct.

15 Q And your work in Every Town, am I correct, that you
16 are focused on a specific program?

17 A Two primary programs, yes.

18 Q And what are those?

19 A The Smart, which focuses on child access prevention
20 and secure storage as well as suicide, and The One Thing You
21 Can Do Program that focuses on extreme risk protection laws.
22 Again, a focus on suicide prevention.

23 Q And why did you decide to get into that work?

24 A Because I care about people and I care about kids
25 just like my mom did.

26 Q And you don't know, other than what you just saw
27 here, anything about Mr. Jones' view on guns; do you?

1 A His view on guns? Absolutely not. I've never looked
2 into it.

3	Q	Do you care?
---	---	--------------

4	A Absolutely not.
---	-------------------

5 Q Do you know what his view is on climate change?

6	A No.
---	-------

7	Q	Do you care?
---	---	--------------

8	A No.
---	-------

9	Q	Do you know what his view is on the economy?
---	---	--

10	A No, I don't.
----	----------------

11 ATTY. PATTIS: Objection, leading.

12	Q Do you --
----	-------------

13 THE COURT: Sustained.

14	Q Do you know what his view is on the economy?
----	--

15 THE COURT: You can ask her if she knows what
16 his views are.

17 Q Do you know what his views are on that?

18	A No.
----	-------

19	Q	Do you care?
----	---	--------------

20	A	Absolutely not.
----	---	-----------------

21 Q Is that what this case is about?

22 A This case was brought because there have been lies
23 about me and my family and they would not stop.

24 ATTY. MATTEI: Thank you. Nothing further.

25 THE COURT: Attorney Pattis?

26 ATTY. PATTIS: Can we continue with 1C, please?

27 RECROSS EXAMINATION BY ATTY. PATTIS:

1 PARALEGAL: Just give me a second to get that
2 up? I apologize.

3 THE COURT: Take your time.

4 Q You never saw the video 1C before today either?

5 A Was 1C the one with --

6 Q That you were just shown?

7 A That's correct.

8 Q Or Mr. Jones refers to the children as little angels?

9 You never heard that either?

10 A I wouldn't know that.

11 Q Okay.

12 ATTY. PATTIS: Nothing further.

13 THE COURT: All right. You may step down. And
14 I think --

15 Just watch your step.

16 I think we'll take the afternoon recess at this
17 time. Fifteen minutes.

18 So, we will reconvene at 3:15.

19 Ron will safeguard your notebooks, and we will
20 see you back at 3:15.

21 (JURY EXIT).

22 (RECESS).

23

24

25

26

27

1 X06-UWY-CV18-6046436-S : SUPERIOR COURT
2 ERICA LAFFERTY : COMPLEX LITIGATION DOCKET
3 v : AT WATERBURY, CONNECTICUT
4 ALEX EMERIC JONES : SEPTEMBER 21, 2022
.....
5 X06-UWY-CV18-6046437-S : SUPERIOR COURT
6 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
7 v : AT WATERBURY, CONNECTICUT
8 ALEX EMERIC JONES : SEPTEMBER 21, 2022
.....
9 X06-UWY-CV18-6046438-S : SUPERIOR COURT
10 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
11 v : AT WATERBURY, CONNECTICUT
12 ALEX EMERIC JONES : SEPTEMBER 21, 2022

13 C E R T I F I C A T E
14

15 I, Linda A. Coon, hereby certify that this is a true
16 and accurate transcription of the above-referenced case,
17 heard in Superior Court, Judicial District of Waterbury,
18 Connecticut, before the Honorable Barbara N. Bellis, on this
19 21st day of September, 2022.
20

21 Dated this 21st day of September, 2022, in Waterbury,
22 Connecticut.
23

24 

25 Linda A. Coon, RPR
26 Court Monitor/ Court Reporter
27

1 X06-UWY-CV18-6046436-S : SUPERIOR COURT

2 ERICA LAFFERTY : COMPLEX LITIGATION DOCKET

3 v : AT WATERBURY, CONNECTICUT

4 ALEX EMERIC JONES : SEPTEMBER 21, 2022

5
X06-UWY-CV18-6046437-S : SUPERIOR COURT

6 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET

7 v : AT WATERBURY, CONNECTICUT

8 ALEX EMERIC JONES : SEPTEMBER 21, 2022

9
X06-UWY-CV18-6046438-S : SUPERIOR COURT

10 WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET

11 v : AT WATERBURY, CONNECTICUT

12 ALEX EMERIC JONES : SEPTEMBER 21, 2022

13 E L E C T R O N I C C E R T I F I C A T E

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